

Jessica Greer Griffith
McDERMOTT WILL & EMERY LLP
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: (212) 547-5578
E-mail: Ggriffith@mwe.com

*Attorneys for UMG Recordings, Inc.
(incorrectly sued herein as Defendants
Uptown Records, MCA Inc., and
Universal Music Group)*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LIZA GARDNER,

Plaintiff,

v.

Civil Action No. 24-7729

SEAN COMBS,
AARON HALL,
UPTOWN RECORDS,
MCA INC.,
UNIVERSAL MUSIC GROUP,
JOHN DOES 1-10 (names being fictitious and
used to connote an unidentified person
responsible for this occurrence), JANE DOES
1-10 (names being fictitious and used to
connote an unidentified person responsible for
this occurrence), ABC CORPORATIONS 1-10
(names being fictitious and used to connote
unidentified entities responsible for this
occurrence),

Defendants.

**CERTIFICATION OF MAX KELLOGG, ESQ.
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

I, Max J. Kellogg, Esq., hereby certify pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at the law firm of McDermott Will & Emery LLP, One Vanderbilt Avenue, New York, NY 10017, attorneys for UMG Recordings, Inc. (incorrectly sued herein as

Defendants Uptown Records, MCA, Inc., and Universal Music Group) (hereinafter “UMGR”) in the above-captioned matter. I submit this certification in support of UMGR’s unopposed motion for my admission *pro hac vice*, pursuant to Local Rule 101.1(c), in this matter.

2. All counsel of record have consented to my appearing *pro hac vice* on behalf of UMGR in the above-captioned matter.

3. Pursuant to L. Civ. R. 101.1(c), the following chart discloses each Bar and Court in which I am a member, including the year of admission and the name and address of the official or office maintaining the roll of such members of its bar. I am in good standing in each of these Bars and Courts:

COURT	YEAR OF ADMISSION	NAME AND ADDRESS
State of New York	February 25, 2019	Supreme Court of the State of New York Appellate Division, First Judicial Department 41 Madison Avenue, 26th Floor New York, NY 10010

4. I am not presently nor have I ever been censured, suspended, disbarred, or otherwise disciplined in any of the Courts or jurisdictions where I have been admitted to practice. I understand that I have a continuing obligation during the period of my *pro hac vice* admission to promptly advise the Court of the institution or disposition of any disciplinary proceedings against me.

5. I will immediately notify the Court of any matter affecting my standing at the bar of any other court.

6. I have been requested to represent UMGR in the above-captioned matter. I am fully familiar with the facts of this action and have previously represented UMGR in connection with the related New York state court proceeding.

7. Upon admission *pro hac vice*, I agree to:


- a. associate with Jessica Greer Griffith of McDermott Will & Emery LLP, or another New Jersey attorney of law representing UMGR, who will continue to serve as counsel in this matter; will review and sign all pleadings, briefs, and other papers filed with the Court; and will be responsible for my conduct;
- b. be bound by all New Jersey disciplinary rules and comply with all rules governing the courts of the State of New Jersey, including the Rules of Professional Conduct and the Local Civil Rules for the District of New Jersey;
- c. submit to the disciplinary jurisdiction of this Court
- d. comply with New Jersey Court Rule 1:28-2(a), requiring annual payment into the New Jersey Lawyers' Fund for Client Protection; and
- e. make a payment of \$250.00 to the Clerk of the United States District Court in accordance with Local Civil Rule 101.1(c)(3),

8. I am familiar with the Local Civil Rules for the District of New Jersey and have read and understand Appendix R thereto.

9. Upon the foregoing facts, I respectfully request that I be permitted to appear as counsel *pro hac vice* on behalf of UMGR in the above-captioned matter.

I hereby certify that the foregoing statements made by me are true and any knowingly false statements may subject me to punishment for perjury.

Dated: July 24, 2024
New York, New York


Max J. Kellogg, Esq.